# UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS

#### DALLAS DIVISION

In re KOSMOS ENERGY LTD SECURITIES	8	Consolidated Civil Action No. 3:12-cv-3/3-B
LITIGATION	§	
	§	CLASS ACTION
	- §	
This Document Relates To:	§	
	§	
ALL ACTIONS.	§	
	8	

JOINT MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION OF SETTLEMENT PROCEEDS

PLEASE TAKE NOTICE that pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, defendants Kosmos Energy Ltd., Brian F. Maxted, W. Greg Dunlevy, Sylvia Manor, John R. Kemp III, David I. Foley, Jeffrey A. Harris, David B. Krieger, Prakash A. Melwani, Adebayo O. Ogunlesi, Chris Tong, Christopher A. Wright, Citigroup Global Markets Inc., Barclays Capital Inc., Credit Suisse Securities (USA) LLC, BNP Paribas Securities Corp., SG Americas Securities LLC, Credit Agricole Securities (USA) Inc., Scotia Capital (USA) Inc. (f/k/a Howard Weil Incorporated), HSBC Securities (USA) Inc., Jefferies LLC (f/k/a Jefferies & Company, Inc.), Natixis Securities Americas LLC (f/k/a Natixis Bleichroeder LLC), and RBC Capital Markets LLC (collectively, "Defendants") and Lead Plaintiff Nursing Homes and Related Industries Pension Plan and plaintiff George M. Mounger (collectively, "Plaintiffs") respectfully move this Court for an order granting final approval of the proposed settlement ("Settlement") of the above-captioned action as embodied in the Stipulation of Settlement dated April 28, 2014, which this Court preliminarily approved by its

This Joint Motion is based on the Stipulation of Settlement dated April 28, 2014, Plaintiffs' Memorandum of Law and Declarations filed in connection with this Motion, all other pleadings and matters of record, and such additional evidence or argument as may be presented.

Order Preliminarily Approving Settlement and Providing for Notice dated May 5, 2014.

DATED: June 23, 2014 Respectfully submitted,

SUSMAN GODFREY LLP DANIEL H. CHAREST

/s/ Daniel H. Charest

DANIEL H. CHAREST

901 Main Street, Suite 5100 Dallas, TX 75205-3775 Telephone: 214/754-1900 214/754-1933

Attorneys for Kosmos Energy, Ltd. and the Individual Defendants

DATED: June 23, 2014

GIBSON, DUNN & CRUTCHER LLP BRIAN M. LUTZ

/s/ Brian M. Lutz

BRIAN M. LUTZ

555 Mission Street Suite 3000 San Francisco, CA 94105-0921 Telephone: 415/393-8379 415/374-8474 (fax)

Attorneys for the Underwriter Defendants

DATED: June 23, 2014

ROBBINS GELLER RUDMAN & DOWD LLP DARREN J. ROBBINS X. JAY ALVAREZ JEFFREY D. LIGHT DANIELLE S. MYERS

### /s/ Darren J. Robbins

#### DARREN J. ROBBINS

655 West Broadway, Suite 1900 San Diego, CA 92101 Telephone: 619/231-1058 619/231-7423 (fax)

Lead Counsel for Plaintiff

KENDALL LAW GROUP, LLP JOE KENDALL (State Bar No. 11260700) JAMIE J. MCKEY (State Bar No. 24045262) 3232 McKinney Avenue, Suite 700 Dallas, TX 75204 Telephone: 214/744-3000 214/744-3015 (fax)

Liaison Counsel

## **CERTIFICATE OF SERVICE**

On June 23, 2014, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court, which served the document on all counsel of record.

/s/ Daniel H. Charest
Daniel H. Charest